

**IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS**

JAN MORTON, individually and on behalf
of all others similarly situated,

Plaintiff,

v.

THRIVE AGENCY LLC

Defendant.

Case No. 1:24-cv-1458

JURY TRIAL DEMANDED

NOTICE OF DISMISSAL WITHOUT PREJUDICE

Pursuant to Fed. R. Civ. P. 41(a)(1)(A)(i), Plaintiff Jan Morton (“Plaintiff”) respectfully notifies that the above-captioned matter is voluntarily dismissed without prejudice.

RESPECTFULLY SUBMITTED AND DATED this November 15, 2025.

/s/ Andrew Roman Perrong

Andrew Roman Perrong, Esq.

Perrong Law LLC

2657 Mount Carmel Avenue

Glenside, Pennsylvania 19038

Phone: 215-225-5529 (CALL-LAW)

Facsimile: 888-329-0305

a@perronglaw.com

CERTIFICATE OF SERVICE

I certify that I filed the foregoing via ECF on the below date.

Dated: November 15, 2025

/s/ Andrew Roman Perrong
Andrew Roman Perrong, Esq.
Perrong Law LLC
2657 Mount Carmel Avenue
Glenside, Pennsylvania 19038
Phone: 215-225-5529 (CALL-LAW)
Facsimile: 888-329-0305
a@perronglaw.com